

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT COURT OF NEW YORK**

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Dibo Hafif :

NOTICE OF MOTION

1:22-cv-01199

Plaintiff(s), :

v. :

Rabbi Eli Mansour Et Al, :

Defendant(s). :

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FILED
Jan 16, 2024, 10:02 PM
in the Clerk's Office
U.S. District Court,
EDNY, Brooklyn
Pro Se Office via
Box.com

PLEASE TAKE NOTICE that upon the declaration of Dibo Hafif, Plaintiff, Pro Se, dated 1/16/2024, and upon the complaint herein, plaintiff will move this court on February 14, 2023, before Judge LaShann Moutique DeArcy Hall at the United States Eastern District Court or as soon as thereafter as can be heard for an order for Judge Hall to recuse herself from this matter and reassign this case to another Justice of this Court.

Dated:1/16/2024

Brooklyn, NY

/s/ Dibo Hafif

Dibo Hafif, Plaintiff – Pro Se

57 Gravesend Neck Road

Brooklyn, NY 11223

917.418.4837

To: Defendants via ECF

I hereby affirm that I served this notice of motion and declaration via ECF.

/s/ *Dibo Hafif*

Dibo Hafif, Plaintiff – Pro Se

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT COURT OF NEW YORK**

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Dibo Hafif : **Declaration of Plaintiff -Pro Se**
Dibo Hafif
CV- 1:22-1199

Plaintiff(s), :

v. :

Rabbi Eli Mansour Et Al, :
Defendant(s). :

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Dibo Hafif, the plaintiff in the above-mentioned case, submit this affidavit in support of the attached proposal under 28 U.S.C. § 1746. I declare the following under penalty of perjury under the laws of the United States of America:

1. This affidavit is submitted in support of the attached proposal concerning a case that has been dormant for over 6 months.
2. The case commenced approximately two years ago, and despite diligent efforts to personally serve the defendants, significant challenges were encountered.

3. Due to difficulties in serving the defendants, I sought the court's assistance in allowing alternative methods of service. Unfortunately, my requests went unanswered, resulting in a substantial delay in the proceedings. I am concerned that this prolonged inactivity violates federal rules, compromising the plaintiff's right to a prompt and fair resolution.
4. I, along with my entire family, have suffered from rights being stripped away and endured abuse for a decade. Individuals without respect for constitutional rights have infringed upon our freedom of religion, dictating their opinions. I was unjustly arrested on March 11, 2021, following pressure from the defendants on my wife to press charges against me, obtaining an order of protection to deprive me of my home, children, and humiliate me in my close-knit community.
5. I express disappointment in the court's response to applications made by the defendants compared to the lack of progress on my applications. This discrepancy raises concerns about potential bias against me. I firmly believe in the importance of impartial justice and fair treatment for all parties in the legal process.
6. Given the circumstances, I respectfully request the appointment of a new judge to oversee this case. A fresh perspective is necessary to ensure an unbiased and just resolution, aligning with the principles of justice and the

rule of law. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

WHEREFORE, Plaintiff respectfully requests that the Court grant Plaintiff's motion in its entirety.

Dated: 1/16/2024

/s/ *Dibo Hafif*

Dibo Hafif, Plaintiff – Pro Se
57 Gravesend Neck Road
Brooklyn, NY 11223
917.418.4837